

David J. Burman (admitted *pro hac vice*)
 Cori G. Moore (admitted *pro hac vice*)
 Eric J. Weiss (admitted *pro hac vice*)
 Nicholas H. Hesterberg (admitted *pro hac vice*)
 Steven D. Merriman (admitted *pro hac vice*)

PERKINS COIE LLP

1201 Third Avenue, Suite 4900
 Seattle, WA 98101-3099
 Telephone: 206.359.8000
 Facsimile: 206.359.9000

Joren Bass, State Bar No. 208143
 JBass@perkinscoie.com

PERKINS COIE LLP

Four Embarcadero Center, Suite 2400
 San Francisco, CA 94111-4131
 Telephone: 415.344.7120
 Facsimile: 415.344.7320

Attorneys for Plaintiff
Costco Wholesale Corporation

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Case No. 3:07-cv-05944-SC
 MDL NO. 1917

This Document Relates to:

Individual Case No.: 3:11-CV-06397-SC

Case No. 3:11-06397-SC
 COSTCO WHOLESALE CORPORATION,
 Plaintiff,
 v.
 HITACHI LTD., et al.,
 Defendants.

**STIPULATION AND [PROPOSED]
 ORDER REGARDING CHUNGHWA'S
 PARTICIPATION IN
 PRETRIAL PROCEEDINGS**

Plaintiff Costco Wholesale Corporation ("Costco") and Defendant Chunghwa Picture Tubes, Ltd. ("Chunghwa"), by their respective attorneys hereby stipulate and agree as follows:

1. Costco and Chunghwa have entered into a comprehensive written settlement agreement calling for, among other things, dismissal of Costco's individual action, 3:11-cv-06397-SC, as to Chunghwa.

2. The Settlement Agreement provides that Chunghwa will fulfill certain terms.

3. Costco's individual action will be dismissed with prejudice as to Chunghwa upon fulfillment of the terms of the Settlement Agreement.

4. This stipulation does not affect the rights or claims of Costco against any other defendant or alleged co-conspirator in this litigation.

5. WHEREFORE, IT IS HEREBY STIPULATED that Chunghwa will not participate in further pretrial proceedings in Costco's individual action, 3:11-cv-06397-SC, as long as it fulfills the terms of the Settlement Agreement.

DATED: September 24, 2013

By: s/ David J. Burman
David J. Burman (*pro hac vice*)
Cori G. Moore (*pro hac vice*)
Steven D. Merriman (*pro hac vice*)
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101
(206) 359-8000
DBurman@perkinscoie.com
CGMoore@perkinscoie.com
SMerriman@perkinscoie.com

Attorneys for Plaintiff
Costco Wholesale Corporation

By: s/ Rachel S. Brass

Joel S. Sanders, SBN 107234

Rachel S. Brass, SBN 219301

GIBSON, DUNN & CRUTCHER LLP

555 Mission Street, Suite 3000

San Francisco, CA 94105-2933

Telephone: (415) 393-8200

Facsimile: (415) 393-8306

E-mail: JSanders@gibsondunn.com

RBrass@gibsondunn.com

Attorneys for Defendant Chunghwa Picture
Tubes, Ltd.

Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.

1 **IT IS SO ORDERED.**

2

3 DATED: _____

4 _____
5 The Honorable Samuel Conti
6 United States District Judge

CERTIFICATE OF SERVICE

I certify that on September 24, 2013, I electronically filed the foregoing Stipulation and [Proposed] Order Regarding Chunghwa's Participation in Pretrial Proceedings with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 24th day of September, 2013.

s/Steven D. Merriman

Steven D. Merriman (*pro hac vice*)

SMerriman@perkinscoie.com

Perkins Coie LLP

1201 Third Avenue, Suite 4900

Seattle, WA 98101-3099

Telephone: 206.359.8000

Facsimile: 206.359.9000

Attorney for Plaintiff

Costco Wholesale Corporation